

**REMARKS**

By this Amendment, Applicants amend claims 1, 7, 8, 13, 19, 20, 25, 31, and 32.

No new matter has been added. Claims 1-36 are pending.

In the Office Action,<sup>1</sup> the Examiner rejected claims 1-36 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement; and rejected claims 1-36 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,275,223 to Hughes (“*Hughes*”) in view of U.S. Patent No. 7,334,216 to Molina-Moreno et al. (“*Molina*”).

**I. Substance of Interview**

Applicants thank the Examiner for conducting a telephone interview with Applicants’ representative on October 5, 2009. The substance of the interview is discussed in relevant sections of this response.

**II. Rejection of Claims 1-36 under 35 U.S.C. § 112, First Paragraph**

Applicants respectfully traverse the rejection of claims 1-36 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Examiner alleged that “[t]he claim recit[ation] . . . of ‘the non-pattern based user interface being developed by editing a source code of the non-pattern based user interface[]’ . . . is not clearly described in the specification.” Office Action, at 2. This is incorrect.

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<sup>1</sup> The Office Action may contain statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

The specification discloses that a non-pattern based user interface is developed through “freestyle programming.” See Applicants’ specification, paras. 008, 010, 055, 073. One of ordinary skill in the art would have understood that freestyle programming involves editing the source code. Therefore, the above-quoted claim recitation is supported by the specification.

During the interview, the Examiner considered paragraphs 008, 010, 055, and 073 of Applicants’ specification, as well as the meaning of freestyle programming as it would have been understood by one of ordinary skill in the art, and the Examiner agreed that the above-quoted claim recitation is sufficiently supported by the specification to comply with the written description requirement.

Accordingly, for at least these reasons, Applicants respectfully request that the Examiner withdraw the rejection of claims 1-36 under 35 U.S.C. § 112, first paragraph.

### **III. Rejection of Claims 1-36 under 35 U.S.C. § 103(a)**

Applicants respectfully traverse the rejection of claims 1-36 under 35 U.S.C. § 103(a) as being unpatentable over *Hughes* in view of *Molina*. A *prima facie* case of obviousness has not been established.

“The key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious.” M.P.E.P. § 2141(III).

[T]he framework for objective analysis for determining obviousness under 35 U.S.C. 103 is stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). . . . The factual inquiries . . . are as follows:  
(A) [Determining the scope and content of the prior art;]

- (B) Ascertaining the differences between the claimed invention and the prior art; and
- (C) Resolving the level of ordinary skill in the pertinent art.

M.P.E.P. § 2141(II). “Office personnel must explain why the difference(s) between the prior art and the claimed invention would have been obvious to one of ordinary skill in the art.” M.P.E.P. § 2141(III).

Independent claim 1 recites a method comprising, for example, “displaying . . . a pattern based user interface . . . including information of a plurality of data objects,” and, “in response to” “a selection of one of the plurality of data objects[,]” “displaying . . . a non-pattern based user interface . . . including . . . information of the selected data object[,]” wherein “the non-pattern based user interface [is] developed by editing a source code of the non-pattern based user interface.”

During the interview, the Examiner agreed that *Hughes* fails to teach or suggest a pattern based user interface and a non-pattern based user interface. However, the Examiner alleged that *Molina* discloses both a pattern based user interface and a non-pattern based user interface. No agreement was reached.

Even assuming *Molina* discloses a “pattern based user interface” and a “non-pattern based user interface,” which Applicants do not concede, the combination of *Hughes* and *Molina* fails to teach or suggest at least the above-quoted elements of claim 1. In particular, *Hughes* and *Molina* fail to teach or suggest “displaying . . . a non-pattern based user interface within the [same] window,” in which the pattern based user interface is displayed, wherein “the non-pattern based user interface includ[es] . . . information of the . . . data object” selected by a user among a plurality of data objects

displayed in the pattern-based user interface, and “the non-pattern based user interface [is] developed by editing a source code of the non-pattern based user interface.”

The Examiner acknowledges that “Hughes does not specifically teach . . . a pattern based user interface provides general information of the data object and the non-pattern base[d] user interface provides detail information of the data object.” Office Action, at 4. *Molina* does not compensate for the deficiencies of *Hughes*.

*Molina* discloses that “the left pane 2400 . . . shows the defined elements . . . [and, w]henver an object in the left tree [pane] 2400 is selected, its properties appear on the right pane 2401.” *Molina*, col. 30, ll. 13-25; see also Fig. 24. However, *Molina* fails to teach or suggest that the right pane 2401 is a “non-pattern based user interface . . . developed by editing a source code,” as recited in claim 1.

On the contrary, *Molina* discloses that “the user interface can be specified using a model . . . and [the model is] automatically transformed into source code.” *Molina*, col. 2, ll. 59-62 (emphasis added). *Molina* further discloses that the user can build the user interface by developing the model using a formal specification language, such as OASIS. *Molina*, col. 2, ll. 52-60; col. 9, ll. 28-30. “After the formal specification [of the model of the user interface] is validated, the translator will convert it into compilable code.” *Molina*, col. 6, ll. 52-54 (emphasis added). Furthermore, *Molina* further discloses “obtaining . . . the user interface . . . without manual coding of the computer code to implement the user interface.” *Molina*, abstract (emphasis added). Accordingly, right pane 2401 of *Molina* cannot correspond to the claimed “non-pattern based user interface . . . developed by editing a source code,” as recited in claim 1. Therefore,

*Molina* fails to teach or suggest “displaying a non-pattern based user interface” “in response to a[n] . . . input” “select[ing] . . . one of the plurality of data objects displayed in the pattern based user interface,” as recited in claim 1.

For at least the above reasons, *Hughes* and *Molina* fail to teach or suggest “displaying . . . a pattern based user interface . . . including information of a plurality of data objects,” and, “in response to” “a selection of one of the plurality of data objects[,]” “displaying . . . a non-pattern based user interface . . . including . . . information of the selected data object[,]” wherein “the non-pattern based user interface [is] developed by editing a source code of the non-pattern based user interface,” as recited in claim 1.

For at least the foregoing reasons, the scope and content of the prior art have not been properly determined, and the differences between the prior art and claim 1 have not been properly ascertained. Moreover, the Examiner has not identified any factors that would have motivated one of ordinary skill in the art to modify the teachings of the prior art to achieve the claimed combination. Accordingly, no reason has been clearly articulated as to why the prior art would have rendered claim 1 obvious to one of ordinary skill in the art. Therefore, a *prima facie* case of obviousness has not been established with respect to claim 1.

Independent claims 13 and 25, although different in scope from claim 1, are allowable for at least the same reasons presented above with respect to claim 1. Dependent claims 2-12, 14-24, and 26-36 are allowable at least due to their dependence from an allowable independent claim. Accordingly, Applicants respectfully

request that the Examiner withdraw the rejection of claims 1-36 under 35 U.S.C.

§ 103(a).

**CONCLUSION**

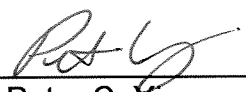
In view of the foregoing, Applicants respectfully request reconsideration of this application and timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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